



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION I
2100 RENAISSANCE BLVD.
KING OF PRUSSIA, PA 19406-2713

March 12, 2021

Stephan Roy, Principal/Office Manager
GZA GeoEnvironmental, Inc.
95 Glastonbury Boulevard
Glastonbury, CT 06033

SUBJECT: GZA GEOENVIRONMENTAL, INC. - NRC INSPECTION NO. 03030105/2020-001 AND NOTICE OF VIOLATION

Dear Mr. Roy:

This letter refers to the announced, remote inspection conducted from October 26, 2020, to March 11, 2021, of your licensed activities and to the onsite visit of your Glastonbury and Trumbull, Connecticut facilities on February 16, 2021. This inspection examined activities conducted under your license as they relate to public health and safety, and to confirm compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas, the inspection consisted of selected observation of licensed activities, examination of procedures and representative records and interviews with personnel. On March 11, 2021, an exit meeting was conducted between Dave Barstow of your staff and Steven Courtemanche of this office wherein the results of the inspection were discussed.

Based on the results of this inspection, the NRC has determined that three Severity Level IV violations of NRC requirements occurred. The violations were evaluated in accordance with the NRC Enforcement Policy. The current Enforcement Policy is included on the NRC's Web site at <https://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>. The violations were cited in the enclosed Notice of Violation (Notice) because the violations were identified by the NRC.

The NRC has concluded that information regarding: (1) the reason for the violation(s); (2) the corrective actions that have been taken and the results achieved; and (3) the date when full compliance will be (was) achieved is already adequately addressed on the docket and include: the establishment of a calendar reminder system for the RSO and management to keep track of when the annual audits, physical inventories and leak tests are due. Therefore, you are not required to respond to this letter unless the description herein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and your reply or additional information, if provided, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

S. Roy

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If you have any questions regarding this matter, please contact Steven Courtemanche of my staff at (610) 337-5075 or via electronic mail at Steven.Courtemanche@nrc.gov.

Thank you for your cooperation.

Sincerely,

Christopher Cahill, Branch Chief
Commercial, Industrial, R&D,
and Academic Branch
Division of Nuclear Materials Safety
Region I

Docket No. 03030105
License No. 06-28068-01

Enclosure: Notice of Violation

cc w/ enclosure:
Juan Bedoya, Radiation Safety Officer
State of Connecticut

GZA GEOENVIRONMENTAL, INC. – NRC INSPECTION NO. 03030105/2020-001 AND NOTICE OF VIOLATION DATED MARCH 12, 2021

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NAME	SCourtemanche/src	LKauffman/lak	MReichard/mcr	CCahill/cgc	
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NOTICE OF VIOLATION

GZA GeoEnvironmental, Inc.
Glastonbury, Connecticut

Docket No. 03030105
License No. 06-28068-01

During an NRC inspection conducted from October 26, 2020 to March 11, 2021, three violations of NRC requirements were identified. In accordance with the NRC Enforcement Policy, the violations are listed below:

- A. 10 CFR 20.1101(c) requires that the licensee periodically (at least annually) review the radiation protection program content and implementation.

10 CFR 20.2102 requires, in part, that each licensee shall maintain records of the radiation safety program, including audits and other reviews of program content and implementation for a period of three years after the record is made.

Contrary to the above, as of February 8, 2021, the licensee failed to periodically (at least annually) review the radiation safety program content and implementation and failed to maintain the records of the radiation safety program pertaining to audits and other reviews of the radiation safety program content and implementation. Specifically, the licensee did not perform reviews for Calendar Year 2019 and 2020. Also, the licensee lost the records for the reviews for Calendar Year 2017 and 2018.

This is a Severity Level IV violation (Enforcement Policy Section 6.3).

The licensee committed to establishing a calendar reminder system so that the RSO and senior management would be aware of when the annual review of the content and implementation of the program was due.

- B. License Conditions 13.A. of NRC License No. 06-28068-01 requires, in part, that sealed sources shall be tested for leakage and/or contamination at intervals not to exceed the intervals specified in the certificate of registration issued by the U.S. Nuclear Regulatory Commission (NRC) under 10 CFR 32.210.

Contrary to the above, between January 20, 2020 and October 29, 2020, the licensee failed to ensure that sealed sources were tested for leakage and/or contamination at intervals not to exceed the intervals specified in the certificate of registration issued by the NRC under 10 CFR 32.210. Specifically, the licensee uses Troxler Electronics Laboratories Series 3400 portable gauges whose certificate of registration issued by the NRC requires that tests be performed at twelve month intervals and gauge serial numbers 18604, 21129, and 29022 were tested on December 17 and 27, 2018, and January 11, 2019, respectively, and all of the gauges on October 29, 2020. Further, the gauges were used at temporary job sites between January 20, 2020 and October 29, 2020, on multiple occasions.

This is a Severity Level IV violation (Enforcement Policy Section 6.7).

The licensee committed to establishing a calendar reminder system so that the RSO and senior management would be aware of when tests for leakage and/or contamination of sealed sources was due.

- C. License Condition 15 of NRC License No. 06-28068-01 requires, in part, that the licensee shall conduct a physical inventory every six months, or at such other intervals approved by the U.S. Nuclear Regulatory Commission, to account for all sealed sources and/or devices received and possessed under the license and records of inventories shall be maintained for 3 years from the date of each inventory.

Contrary to the above, as of November 16, 2020, the licensee failed to conduct a physical inventory every six months to account for all sealed sources and/or devices received and possessed under the license, another interval was not approved by the U.S. Nuclear Regulatory Commission, and records of inventories were not maintained for 3 years from the date of each inventory. Specifically, the licensee stated on November 16, 2020, that the last physical inventory was conducted in late 2019 and that all of the records of inventories were lost during an office move.

This is a Severity Level IV violation (Enforcement Policy Section 6.3).

The licensee committed to establishing a calendar reminder system so that the RSO and senior management would be aware of when physical inventories were due.

The NRC has concluded that information regarding the reason for the violations, the corrective actions taken and planned to correct the violations and prevent recurrence and the date when full compliance will be achieved is already adequately addressed on the docket. However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation," and send it to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region I, within 30 days of the date of the letter transmitting this Notice of Violation (Notice).

If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, any response which contests an enforcement action shall be submitted under oath or affirmation.

Your response will be placed in the NRC Public Document Room (PDR) and on the NRC Web site. To the extent possible, it should, therefore, not include any personal privacy, proprietary, or safeguards information so that it can be made publically available without redaction.

However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days of receipt.

Dated This 12th day of March 2021